

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ALI KARIMI, Individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

DEUTSCHE BANK AKTIENGESELLSCHAFT,  
JOHN CRYAN, CHRISTIAN SEWING,  
MARCUS SCHENCK, and JAMES VON  
MOLTKE,

Defendants.

[PROPOSED] 

CIVIL CASE MANAGEMENT PLAN  
(JUDGE RAKOFF)

Case No. 22-cv-2854 (JSR)

**This Court requires that this case shall be ready for trial on February 17, 2023.**

After consultation with counsel for the parties, who conferred in advance, the following Case Management Plan is adopted. This plan is also a scheduling order pursuant to Rules 16 and 26(f) of the Federal Rules of Civil Procedure.

- A. The case is to be tried to a jury.
- B. Joinder of additional parties must be accomplished by June 30, 2022.
- C. Amended pleadings may be filed without leave of Court until June 30, 2022.
- D. Defendants' Answer must be filed on or before 30 days after the filing of the Court's full opinion on Defendants' motion to dismiss.
- E. Discovery (in addition to the disclosures required by Fed. R. Civ. P. 26(a)):
  - 1. Documents. First request for production of documents, if any, must be served by June 24, 2022. Further document requests may be served as required, but no document request may be served later than 30 days prior to the date of the close of discovery as set forth in item 8 below.

2. Initial Disclosures. Initial disclosures must be served by June 17, 2022.
3. Interrogatories. Interrogatories pursuant to Rule 33.3(a) of the Local Civil Rules of the Southern District of New York must be served by September 30, 2022. No other interrogatories are permitted except upon prior express permission of Judge Rakoff. No Rule 33.3(a) interrogatories need be served with respect to disclosures automatically required by Fed. R. Civ. P. 26(a).
4. Experts: Every party-proponent of a claim (including any counterclaim, cross-claim, or third party claim) that intends to offer expert testimony in respect of such claim must make the disclosures required by Fed. R. Civ. P. 26(a)(2) by November 1, 2022. Every party-opponent of such claim that intends to offer expert testimony in opposition to such claim must make the disclosures required by Fed. R. Civ. P. 26(a)(2) by November 30, 2022. No expert testimony (whether designated as “rebuttal” or otherwise) will be permitted by other experts or beyond the scope of the opinions covered by the aforesaid disclosures except upon prior express permission of the Court, application for which must be made no later than 10 days after the date specified in the immediately preceding sentence. All experts may be deposed, but such depositions must occur within the time limit for all depositions set forth below.
5. Depositions. All depositions (including any expert depositions, *see* item 4 above) must be completed by January 6, 2023. Unless counsel agree otherwise or the Court so orders, depositions shall not commence until all parties have completed the initial disclosures required by Fed. R. Civ. P. 26(a)(1) or until four weeks from the date of this Order, whichever is earlier. Depositions shall proceed concurrently, with no party having priority, and no deposition shall extend beyond one business day without prior leave of the Court.
6. Requests to Admit. Requests to Admit, if any, must be served by December 7, 2022.
7. All discovery is to be completed by January 6, 2023. Interim deadlines for items 1–6 above may be extended by the parties on consent without application to the Court, provided the parties are certain they can still meet the discovery completion date set forth in this paragraph. The discovery completion date may be adjourned only upon a showing to the Court of good cause and may not be extended on consent.

F. Class Certification

1. Experts. Initial class certification expert reports are due by July 18, 2022; rebuttal expert reports are due by August 22, 2022; and reply expert reports are due by September 19, 2022.
2. Motions. The motion for class certification shall be filed by July 18, 2022; any opposition papers shall be filed by August 22, 2022; and reply papers shall be filed by

September 19, 2022. The Court will hold oral argument on the class certification motion on 9/29/22 at 4pm in Courtroom 14B, 500 Pearl Street.

G. Post-discovery summary judgment motions in the form prescribed by the Court's Individual Rules of Practice may be brought without further consultation with the Court provided that a Notice of any such motion, in the form specified in the Court's Individual Rules of Practice, is filed no later than one week following the close-of-discovery date (item D-8 above), and provided that the moving papers are filed by January 13, 2023, answering papers filed by February 3, 2023, and reply papers filed by February 17, 2023. Each party must file its respective papers with the Clerk of the Court on the same date that such papers are served. Additionally, on the same date that any papers are served and filed, counsel filing and serving the papers must arrange to deliver courtesy non-electronic hard copies to the Courthouse for delivery to Chambers.

H. A final pre-trial conference, as well as oral argument on any post-discovery summary judgment motions, shall be held on 2/28/23 at 4pm in Courtroom 14B, 500 Pearl Street, at which time the Court shall set a firm trial date. The timing and other requirements for the Joint Pretrial Order and/or other pretrial submissions shall be governed by the Court's Individual Rules of Practice.

I. All motions and applications shall be governed by Judge Rakoff's Individual Rules of Practice. Counsel shall promptly familiarize themselves with all of the Court's Individual Rules, as well as with the Local Rules for the United States District Court for the Southern District of New York.

SO ORDERED.

  
JED S. RAKOFF  
U.S.D.J.

DATED: New York, New York  
5/26/22